

## **Exhibit 6**

April 7, 2022 Email

**From:** Durivage, Lee C.  
**To:** Samuel Datlof  
**Cc:** Nina Menniti; [ssb@llrlaw.com](mailto:ssb@llrlaw.com)  
**Subject:** RE: [External Email] Reyes v. Harris - meet and confer  
**Date:** Thursday, April 7, 2022 11:27:42 AM  
**Attachments:** [image001.png](#)  
[Ovalle - NOD for Patrick Ulupano \(145471001 1\).pdf](#)  
[Ovalle - NOD for Luis Ovalle \(145471451 1\).pdf](#)  
[Ovalle - NOD for Benjamin Vazquez \(145471539 1\).pdf](#)  
[Ovalle - NOD for Miguel Ovalle \(145471613 1\).pdf](#)  
[Ovalle - NOD for Juan Ovalle \(145471668 1\).pdf](#)  
[Ovalle - NOD for Adrian Ovalle \(145471729 1\).pdf](#)

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Sam:

Happy to have a meet and confer but I'm unavailable this afternoon as I am meeting with client. I am out tomorrow but I am available any time Monday; Tuesday (I need to be off the line for a Rule 16 at 11:00 a.m.) and any time on Wednesday. I am attaching the notice of depositions for your clients based upon the dates you previously offered – if we need to change any of the dates, feel free to let me know. Please also remind me who will require translators so that can be booked as well.

Please also let me know if you are able to accept service for the subpoena to Margaret Reyes or if I need to have our process server do so.

### Lee C. Durivage

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**From:** Samuel Datlof <[SDatlof@justiceatworklegalaid.org](mailto:SDatlof@justiceatworklegalaid.org)>

**Sent:** Wednesday, April 6, 2022 4:09 PM

**To:** Durivage, Lee C. <[LCDurivage@MDWCG.com](mailto:LCDurivage@MDWCG.com)>

**Cc:** Nina Menniti <[NMenniti@justiceatworklegalaid.org](mailto:NMenniti@justiceatworklegalaid.org)>; Sarah Schalman-Bergen <[ssb@llrlaw.com](mailto:ssb@llrlaw.com)>

**Subject:** Reyes v. Harris - meet and confer

**WARNING: This email originated outside MDWCG**

Lee:

We write to request an immediate meet and confer about your incomplete discovery responses. We note first of all that you have still not produced any written discovery in response to our document requests, and that production of the documents required in Judge Kearney's scheduling order about initial disclosures will be a full 2 months tardy tomorrow (they were due Feb 7). Please let us know

your availability tomorrow, April 7, at either noon or between 2:30 and 4.

Additionally, I note that we plan to notice a 30b6 deposition. We'll plan to do it on one of the dates you offered. We will be noticing depositions for our clients who are abroad (remotely). We will plan on doing that for May 17-19. If you want to fight about taking the depositions in person, we'll look out for your motion. We will be moving for a protective order if you notice them for in person depositions. That said, at least as far as dates go, May 17-19 is agreeable to them.

We'll get back to you about other deposition dates after confirming with our clients.

Sam

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